# STANDARDS FOR IDAHO SCHOOL BUSES & OPERATIONS A Summary of Changes from Current Rule or Practice

Changes in Standards Since Aug. 3 Proposed Standards – Bold & Italicized

# <u>TITLE PAGE, CREDITS, FORWARD, ACKNOWLEDGMENTS, TABLE of</u> <u>CONTENTS, and IDAPA 08.02.02</u>

- 1. Change board adoption date.
- 2. Remove name of current superintendent of public instruction.
- 3. Change in text-box description.
- 4. Remove all individual credits, forward page, acknowledgments, table of contents and rule text.

#### **CONSTRUCTION STANDARDS**

Standards for Idaho School Buses – Pages 1-61

33-1511, Idaho Code, directs the State Board of Education to adopt, publish and distribute minimum standards for the construction of school buses. In the recent past, the board has elected to adopt the standards incorporated in the latest report of the National Conference on School Transportation, with few exceptions. The National Conference on School Transportation convenes every five years.

Over the years this practice has created difficulties for school districts, new school bus dealers and State Department of Education pupil transportation staff. Some National Standards have not been provided by school bus manufacturers, e.g., full width entrance door steps and interlocking braking systems on specially equipped school buses. Also, receipt of requested interpretations of specific requirements have been slow.

## Responsibilities of Suppliers – Page 3

Idaho writing its own school bus construction standards allows the delineation of supplier responsibilities specific to delivery requirements.

#### **CHASSIS**

#### Air Conditioning – Page 6

Air conditioning is becoming a desired feature in some school districts. Reimbursement for this option has not been addressed previously. Standards of Idaho School Buses & Operations identifies air conditioning as a "non-reimbursable option" and allows for exceptions.

#### Axles Page 7

The proposed standards posted on the State Board's web page (Aug. 3) shows language that is stricken. This occurred secondary to transferring data electronically and the stricken language was not intended.

## Brakes (Hydraulic) – Page 7

Audible and Visible Warning Signals: Standards for Idaho School Buses and Operations will allow Type A1 and Type B1 school buses to meet OEM standard.

**Service Brake Pressure Application Gauge:** Standards for Idaho School Buses and Operations will require this option on all hydraulic brake equipped school buses if, and only if, it is OEM available.

#### Brakes (Air) – Page 7

**Service Brake Pressure Application Gauge:** Standards for Idaho School Buses and Operations will require this option on all air brake equipped school buses.

# Bumper (Front) – Pages 7-8

**Towing Device(s):** Standards for Idaho School Buses and Operations allows for other types of towing devices.

# Color – Pages 8-9

National School Transportation Specifications & Procedures uses the term "wheels," which can be confused with "rim." SDE pupil transportation staff believes the term "axle hubs" more clearly describes the intent of National Standards.

# Engine Fire Extinguisher – Page 10

National School Transportation Specifications & Procedures permits (not a mandate) this option. SDE pupil transportation staff no longer believes it is necessary to mandate fire-block seating. Engine fire extinguishers may be more effective and far less expensive. Fire-block seating will no longer be a reimbursable option, therefore, an automated engine fire extinguisher may be a reimbursable option with prior approval.

#### Instruments and Instrument Panel (Tachometer) – Page 13

Standards for Idaho School Buses and Operations will mandate a tachometer on all school buses, which is a valuable training tool and can eliminate premature engine failure.

# Passenger Load - Page 14

Standards for Idaho School Buses and Operations liberalizes National Standard related to manufacturer providing GVWR certification.

#### Retarder System – Page 14-15

Standards for Idaho School Buses and Operations permits a secondary braking system on school buses. Reimbursement for this option will be limited. Removes National Standard language requiring performance requirement.

# Shock Absorbers – Page 15

Standards for Idaho School Buses and Operations adds language that requires damage limiting design of shock absorber mounting.

#### **BODY**

#### Aisle – Page 18

Standards for Idaho School Buses and Operations prohibits the use of flip seats on Idaho school buses.

Standards for Idaho School Buses and Operations will permit excess emergency exit systems to be made inoperable when complying with specific requirements.

## Color – Page 19

Standards for Idaho School Buses and Operations will require that all school bus rub rails, in addition to body trim, to be painted black.

## Communications – Page 20

Standards for Idaho School Buses and Operations will require school buses equipped with a communication system.

# Defrosters - Page 21

Standards for Idaho School Buses and Operations will prohibit the use of low profile heaters within the clear floor area designed to accommodate a wheelchair.

## Emergency Exits and Emergency Exit Alarm Systems – Pages 22-23

Standards for Idaho School Buses and Operations will specify "emergency door" labeling on emergency doors or other emergency exits.

Standards for Idaho School Buses and Operations will specify placement of emergency door and/or emergency exit operating instructions.

Standards for Idaho School Buses and Operations will require the placement of emergency exits in a school bus designed to provide optimal egress during an emergency.

Standards for Idaho School Buses and Operations will require an audible warning device for emergency window exits.

Standards for Idaho School Buses and Operations will require any school bus utilizing a two-door emergency exit option to incorporate a three point locking device.

Fire Extinguisher – Page 23

Standards for Idaho School Buses and Operations will require Idaho's school buses to be equipped with fire extinguishers that incorporate a hose into its design.

#### First Aid Kit – Page 24

Standards for Idaho School Buses and Operations requires first aid kits and body fluid kits, in addition to fire extinguishers, to be sealed in such a way that will not interfere with their use, while also showing when a device has been tampered with. Standards for Idaho School Buses and Operations will remove National Standard requiring latex gloves.

# Body Fluid Clean-Up Kit – Page 24

Standards for Idaho School Buses and Operations requires first aid kits and body fluid kits, in addition to fire extinguishers, to be sealed in such a way that will not interfere with their use, while also showing when a device has been tampered with. Standards for Idaho School Buses and Operations will remove National Standard requiring latex gloves and will require "medical examination gloves."

# Flares and Axes – Page 25

Standards for Idaho School Buses and Operations prohibits ignitable flares and axes on school buses.

#### Floors – Page 25

Standards for Idaho School Buses and Operations prohibits low profile heaters within the clear floor area designed to accommodate a wheelchair.

# Heaters and Air Conditioning Systems – Pages 25-28

National School Transportation Specifications & Procedures requires heater hoses to be shielded to prevent scalding. Standards for Idaho School Buses and Operations requires the hoses to be shielded in such a way as to prevent burning or other types of injury.

#### Identification – Pages 28-30

Standards for Idaho School Buses and Operations will require standardized school bus numbering, while allowing for some flexibility beyond the standard.

Unauthorized entry placards shall be displayed . . . in accordance with 18-1522 and 18-113, Idaho Codes.

Standards for Idaho School Buses and Operations requires special identification, decals and/or logos to be somewhat restrictive.

Standards for Idaho School Buses and Operations will require that labeling and/or signing, specific to loading/unloading and/or railroad crossing procedures, on the rear of the bus not interfere with other required operation instructions.

Standards for Idaho School Buses and Operations permits labeling promoting school bus safety, subject to restrictive criteria.

Interior – Pages 30-31

**Overhead Storage:** No interior overhead storage compartment will be allowed for purposes of reimbursement.

**Operational Equipment:** Standards for Idaho School Buses and Operations requires that operational equipment and accessories to be secured in such a way as to minimize the entanglement of clothing, backpack straps, drawstrings, etc.

Lamps and Signals – Pages 31-33

**Exterior Entrance Door Lamp:** Standards for Idaho School Buses and Operations requires an exterior entrance door lamp to be mounted on Idaho's school buses to illuminate the approach area during darkness.

**School Bus Alternately Flashing Signal Lamps:** Standards for Idaho School Buses and Operations allows for the option of activating a bus's red alternately flashing signal lamps without opening the entrance door, as long as the procedure is in accordance with law and current training curriculum.

**Turn Signal and Stop/Tail Lamps:** Standards for Idaho School Buses and Operations provides additional language necessary to enhance National Standards related to side mounted turn signal lamps on school buses.

**Strobe Light:** Standards for Idaho School Buses and Operations provides additional language that enhances National Standards related to the mounting and use of strobe lights on school buses.

Seat and Restraining Barriers – Pages 35-37

**Fire Block Upholstery:** Fire block seating will no longer be a reimbursable expense.

Pre School Age Seating, Driver Seat and Driver Restraint System: The proposed standards posted on the State Board's web page (Aug. 3) shows language that is stricken. This occurred secondary to transferring data electronically and the stricken language was not intended.

**Driver Seat:** Standards for Idaho School Buses and Operations adds additional ergonomic requirements.

**Seat Belt Cutting Device:** Standards for Idaho School Buses and Operations requires all Idaho school buses to be equipped with a seat belt cutting device.

Tailpipe – Page 38

Standards for Idaho School Buses and Operations provides the option of specifying either the left or right side of the rear emergency door for tailpipe exit location.

# Ventilation – Page 40

**Auxiliary Fans:** Standards for Idaho School Buses and Operations provides more restrictive language related to the placement of auxiliary fans and providing adequate visibility.

## SPECIALLY EQUIPPED SCHOOL BUSES

## Identification – Page 45

National School Transportation Specifications & Procedures requires a International Symbol of Accessibility on specially equipped school buses, no larger than 12 sq. inches (3.464 x 3.464) in size. SDE pupil transportation staff believes this is a typing error. The Standards for Idaho School Buses and Operations corrects this and also mandates a minimum size.

# Special Light – Page 54

Standards for Idaho School Buses and Operations will require additional special lighting on specially equipped school buses.

# **ALTERNATIVE FUELS (Pages 57-60)**

National School Transportation Specifications & Procedures lists advantages and disadvantages to specific types of alternative fuels. Standards for Idaho School Buses and Operations removes language related to the advantages and disadvantages of specific types of alternative fuels.

Standards for Idaho School Buses and Operations adds an available alternative fuel that is not addressed in National Standards, i.e., Biodiesel.

#### SCHOOL BUS WITHDRAWAL STANDARDS (Page 61)

Standards for Idaho School Buses and Operations requires State Department of Education pupil transportation staff to develop, maintain and periodically distribute an Out-of-Service Matrix. The language differs from the proposed language of August 3<sup>rd</sup>.

#### **OPERATIONS**

#### **Administration – Page 62**

New and non-controversial. Supports intent of 33-1006 and 33-1511, Idaho Codes.

## Written Policies – Pages 62-63

**Written Policies:** Standards for Idaho School Buses and Operations captures current rule (some of which is by reference) and adds language requiring local policy regarding the transportation of disabled students. It adds language requiring contracting school districts to ensure compliance by any contracted service. The proposed rule shifts specific operational rules by reference to local policy while maintaining or enhancing current rule and/or practice.

**Driver and Route Evaluations:** Standards for Idaho School Buses and Operations permits either the transportation supervisor or the district's driver trainer, (33-1511, Idaho Code) to conduct driver and route evaluations. Language also requires the State Department of Education to develop and maintain model evaluation forms.

**Emergency Evacuation Drills:** Current rule requires school districts to conduct emergency evacuation drills. Standards for Idaho School Buses and Operations shifts this to local policy but requires compliance with National Highway Safety Program Guideline #17 and also requires documentation of compliance.

**Pupil Transportation:** Standards for Idaho School Buses and Operations requires districts to develop policy specific to pupil transportation safety.

**Personnel Qualifications & Training (Page 63-65):** Standards for Idaho School Buses and Operations requires school districts to adopt prerequisite qualifications and/or job descriptions related to pupil transportation personnel and references Idaho Code and Federal Motor Carrier Safety Administration regulations. The majority of the language currently resides in rule by reference.

**School Bus Driver Training:** Standards for Idaho School Buses and Operations requires SDE to develop and maintain model classroom and behind-the-wheel curriculum, which is a shift from referencing specific training documents in rule.

Standards for Idaho School Buses and Operations allows greater flexibility in the minimum number of pre-service and in-service hours.

Standards for Idaho School Buses and Operations clarifies acceptable criteria related to accepting previous out-of-state and out-of-district school bus driver training in order to be in compliance with current training requirements.

**Personnel File (Page 64):** Standards for Idaho School Buses and Operations requires the filing of physical waivers in accordance with 33-1509, Idaho Code and references CDL licensing requirements related to driver record checks in support of current record checks requirement.

**Maintenance & Service (Page 65):** Standards for Idaho School Buses and Operations paraphrases 33-1506, Idaho Code and requires SDE to develop pupil transportation staffing guidelines in hopes that school districts will eventually cluster near acceptable staffing guidelines.

# **Vehicle Operation – Pages 65-67**

**Pretrip Inspections (Page 65):** Standards for Idaho School Buses and Operations enhances current pretrip inspection requirements and requires districts to provide drivers with pretrip inspection form. Standards for Idaho School Buses and Operations also requires SDE to develop and maintain model pretrip inspection form(s) and also requires drivers to report defects. Language referencing CDL pretrip inspections has been removed since August 3<sup>rd</sup> subsequent to steering committee input.

**Unsafe Objects (Page 65):** Standards for Idaho School Buses and Operations requires school districts to develop policy delineating what objects can and cannot be safely transported and provides examples. New language liberalizes animal restrictions.

**Unsafe Bus Stops (Page 66):** Standards for Idaho School Buses and Operations adds criteria for locating safe bus stops.

**Loading/Unloading of Passengers (Page 66):** Current rule provides specific procedures to follow when loading or unloading passengers. Standards for Idaho School Buses and Operations is broad based, is subject to 49-1422, Idaho Code, and requires SDE to develop and maintain student loading/unloading training curriculum. New language will change crossing in front of bus distance to the nationally accepted ten (10) feet. Current rule is fifteen (15) feet.

# **PUPIL MANAGEMENT (Page 67)**

Current board rule details specific behavior management expectations while riding a school bus. Standards for Idaho School Buses and Operations shifts rule responsibility to the local authority and requires policy related to due process and delineating responsibilities of teachers, drivers and students. Standards for Idaho School Buses and Operations language requires SDE to develop and maintain model student management guidelines, rules and regulations as part of the department's training curriculum.

#### STUDENT ELIGIBILITY (Pages 67-68)

Current reporting requirements penalize school districts when transporting ineligible students. Standards for Idaho School Buses and Operations

differentiates between eligible, ineligible, non-public and non-student riders and clarifies when a school district will be allowed to transport specific categories of students without being financially penalized. Standards for Idaho School Buses and Operations protects ridership rights of eligible students and requires prior approval for some riders by an appropriate authority.

#### FINANCIAL REPORTING

Standards for Idaho School Buses and Operations describs need for accurate record keeping in regards to pupil transportation program. New language reaffirms need for supporting documentation related to proper accounting procedures. New language enhances need to track "runs," "categorized mileages," "ridership counts," and "related costs." (Pages 68-69)

Operation Costs (Page 69-70): Standards for Idaho School Buses and Operations captures IRI reading program as reimbursable. New language permits reimbursement for special or unique programs on a case-by-case basis. New language requires SDE to develop and maintain staffing and bus inventory guidelines for district to use as a model. It is not the intent of the Standards for Idaho School Buses and Operations to financially penalize school districts who fall outside the developed guidelines.

Standards for Idaho School Buses and Operations clarifies method of calculating ridership and emphasizes importance of operating school buses in a safe manner and keeping emergency egress systems operable.

Standards for Idaho School Buses and Operations captures "non-conforming vehicles" (non-yellow vehicles used to transport students to –from school or on school related activities) into safety guidelines, mileage tracking, ridership, operational costs, etc. The language is not intended to penalize school districts that chose to use non-conforming vehicles but will be used to calculate true overall pupil transportation costs.

Safety Busing (Page 71): Standards for Idaho School Buses and Operations removes the requirement of SDE pupil transportation staff visiting local safety busing sites statewide and subsequently making recommendations based on short-term, inconclusive observations. In-lieu of on-site visits by SDE, new language escalates the level of district accountability in approving busing sites. New language requires that the district develop, use and file a measuring instrument that utilizes a rating scheme. New language mandates the State Department of Education to develop and maintain a model measuring instrument. New language requires school districts to reevaluate all district safety busing sites at intervals of at least every three years and verify that conditions of previously approved safety busing sites are unchanged. New language changes the date for submitting requests from October 31, to March 31. *Proposed rules required the prior approval of district measuring instruments and the submittal of board minutes* 

approving all new safety busing sites. These two requirements have been removed from the pending rule subsequent to input received at the October 17, 2001, public hearing.

Contracting Transportation Services (Page 72): Standards for Idaho School Buses and Operations eliminates reimbursement to contracting school districts for liaison personnel and other transportation operational costs associated with maintaining that liaison. It is expected that this change in rule and/or practice will result in approximately \$336,244 in reimbursement savings. This amount currently goes to only a small number of school districts (nine).

Leasing District-Owned School Buses (Page 72): Standards for Idaho School Buses and Operations requires school districts to use caution when leasing their school buses to organizations or individuals and to ensure continued insurance coverage.

Insurance (Page 72): Standards for Idaho School Buses and Operations reduces the amount of insurance required on district owned school buses. This language is subsequent to input from State Risk Management and State Board of Education personnel following the August 3<sup>rd</sup> proposed rule language.

**Non-Traditional Education Programs (Page 72):** Standards for Idaho School Buses and Operations permits reimbursement for special or unique programs on a case-by-case basis.

Capital Investment (Page 72-73): Standards for Idaho School Buses and Operations clarifies reimbursement on the purchase and use of cellular telephones in-lieu of or in place of hard-wired two-way communication radios.

**Depreciation (Page 73):** Depreciation reimbursement for new school buses is based on an accelerated depreciation formula. When a school district sells or trades a bus prior to the life expectancy of the bus, the district might be able to generate more revenue than initially expended. Therefore, Standards for Idaho School Buses and Operations will eliminate potential profiting. School districts will forfeit a progressively less amount as the vehicle ages. **Subsequent to input since August 3<sup>rd</sup>**, the example in proposed rule has been removed.

**Standards (Page 73):** Standards for Idaho School Buses and Operations allows depreciation reimbursement on a small number of new school buses without requiring a prerequisite to –from route assignment.

**Retrofit (Page 73):** Standards for Idaho School Buses and Operations clarifies construction standards applicable to partially retrofitting a used school bus with new equipment and/or technology.

**Life Expectancy (Page 74):** Standards for Idaho School Buses and Operations changes the current method of averaging the costs of new school buses according to category, mandates a "high-low mean" method of averaging and permits reasonable adjustments when no high-low mean can be determined within a specific category.

**Purchase Price (Page 75):** Standards for Idaho School Buses and Operations reaffirms SBE/SDE interest in school district bidding prerequisites related to new school bus purchases and permits reasonable adjustments in allowable depreciation reimbursement. *Non-essential options in the proposed rule is changed to non-reimbursable options in the pending rule.* 

School Bus Delivery Costs (Page 75): Standards for Idaho School Buses and Operations changes reimbursement allowances related to school districts that purchase new school buses FOB factory. New language reaffirms amortizing new school bus delivery costs and related mileage as an element of the initial purchase price of the bus. Language has been added since August 3<sup>rd</sup> that caps the amount that will be reimbursed for delivery costs.

Nonreimbursable Costs (Page 75): Standards for Idaho School Buses and Operations allows for reimbursement for costs associated with leasing a school bus in emergency situations.

Inoperable Bus (Page 76): Standards for Idaho School Buses and Operations clarifies current practice of removing a school bus from depreciation reimbursement consideration when the vehicle is no longer usable. Standards for Idaho School Buses and Operations reaffirms correct accounting practice of subtracting revenues received, subsequent to insurance claims, from the pupil transportation reimbursement claim.

**Depreciation Account (Page 76):** Standards for Idaho School Buses and Operations requires a school district to post revenues received from the sale of a used school bus into a special account to be used for the purchase of new school buses. New language clarifies how to account for trade-in values when purchasing a new school bus.

**Computerized Routing (Page 76):** Standards for Idaho School Buses and Operations establishes reimbursement criteria related to computerized routing software.

Reimbursement Matrix (Page 76): Standards for Idaho School Buses and Operations requires State Department of Education staff to develop, maintain and periodically distribute a reimbursement matrix.

Referenced Documents: All documents referenced in Standards for Idaho School Buses and Operations will include its title and its source. Therefore, no appendix is included in the pending rule.